QAPP Worksheet #9 Project Scoping Session Participants Sheet

Project Name: River Mile 10.9 Removal Action O&M **Project Manager: Bill Potter/ Robert Law**	**Site Name: Diamond Alkali OU 2 – LPRSA RI/FS** **Site Location: LPRSA; RM 10.9**
Date of Session: 19 December 2013 **Scoping Session Purpose: Stephanie Vaughn initiated this request for a teleconference to continue an open technical discussion regarding the capping O&MM plan for RM 10.9.** .	

Name	Affiliation	Phone #	E-mail Address	Project Role
Willard Potter	de maximis, inc.	908.735.9315	otto@demaximis.com	CPG Project Coordinator
Robert Law	de maximis, inc.	908.735.9315	rlaw@demaximis.com	CPG Project Coordinator
Stephanie Vaughn	EPA	212.637.3914	vaughn.stephanie@epa.gov	EPA Project Manager
Marc Greenberg	EPA	732.321.6754	greenberg.marc@epa.gov	EPA Senior Technical
Karl Gustavson	EPA	202.208.3818	gustavson.karl@epa.gov	EPA Senior Technical
Matt Lambert	EPA	703.603.7174	lambert.matt@epa.gov	EPA Senior Technical
George Hicks	CH2M Hill	812.946.1669	george.hicks@ch2m.com	CPG Technical Consultant
Mike Jury	CH2M Hill	937.220.2961	Mike.jury@ch2m.com	CPG Technical Consultant
Jennifer Wilkie	CH2M Hill	773.458.2830	jennifer.wilkie@ch2m.com	CPG Technical Consultant

Comments/Decisions:

Points of Concern presented by the CPG regarding chemical sampling proposed by EPA

- What is the intended use for chemical sampling? CPG agrees that physical monitoring is necessary.
- Not clear what the data will be used for, no Data Quality Objectives (DQOs) identified by EPA. CPG is concerned with proceeding without a better idea of the use(s) for chemical sampling and especially DQOs.
- Frequency and urgency of EPA's proposed sampling events (1, 3, and 5 years) is aggressive and premature given the design of the cap and the breakthrough of the COCs are greater than 100 years.
- Number of sample locations (20 locations, 3 depths) and associated analytical work for multiple parameters maybe too dense; the program outlined by EPA is expensive.
- Sampling is not trivial, need multiple samplers to accommodate various depth intervals and different chemical types at each location
- If chemical transport through the cap is the main concern, why not consider monitoring for the most mobile constituent(s) in the sediments (e.g. PAHs), not the "immobile" dioxin or PCBs?
- CPG is concerned about data being used outside the intended scope.
- CPG is concerned that data could be misinterpreted, e.g., if contaminated sediment from other areas of the river was deposited on top of the cap.
- If chemical monitoring is required by EPA, consider a phased approach. For example, first look at a smaller subset of sample locations or chemical constituents and, if results indicate a potential issue, then expand the sampling.

EPA Responses

- Chemical sampling is needed to get a baseline. Baseline would then be used to identify changes in concentration with time.
- Need to collect enough samples to get statistically significant results and overcome bias from sample heterogeneity, which is the basis for the 20 locations.
- Acknowledged and understood our concern about data being used outside the intended scope / DQOs.
- Did not think that a frequency of 1, 3, and 5 years was too much.
- Multiple samplers can be deployed in a single casing, so not really an issue.
- The vertical delineation of chemical concentrations through the cap would help identify the source (i.e., sediments under the cap versus sediment deposited on cap surface from off-site source)
- Would consider the idea of a phased approach with respect to spatial coverage and/or chemicals, but noted that not sampling for the primary COPCs (e.g., PCBs or Dioxins) would be difficult to explain to the public.

Next Steps

- EPA will look into possibility of developing a preliminary set of DQOs for RM 10.9 for further discussion and basis for CPG developing more complete DQOs.